

**IN THE UNITED STATES DISTRICT COURT FOR
THE NORTHERN DISTRICT OF GEORGIA
ATLANTA DIVISION**

COBB COUNTY, GEORGIA,

Plaintiff,

v.

TYLER TECHNOLOGIES, INC.,

Defendant.

Case No. 1:24-cv-00045-LMM

**TYLER TECHNOLOGIES, INC.’S UNOPPOSED MOTION
FOR AN EXTENSION OF THE INITIAL DISCLOSURE
AND JOINT PRELIMINARY REPORT DEADLINES**

Defendant Tyler Technologies, Inc. (“Tyler Tech”), respectfully moves for an extension through and until March 15, 2024, of the deadlines for the parties to submit their joint preliminary report and discovery plan and to exchange their initial disclosures.

This request is justified because Tyler Tech intends to file a counterclaim with its answer by the March 1, 2024, deadline for answering Cobb County’s amended complaint. The contemplated counterclaim will necessarily impact the substance of the joint preliminary report and discovery plan and the parties’ initial disclosures. An extension, therefore, would obviate the need for an amended discovery plan and supplemental initial disclosures.

Cobb County consents to the requested relief.

A proposed order is attached to this motion as Exhibit A.

Respectfully submitted, this 15th day of February, 2024.

KHAYAT LAW FIRM

/s/ Brian D. Spielman

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LR 7.1(D) CERTIFICATE OF FONT COMPLIANCE

I certify that the foregoing document has been prepared with one of the font and point selections approved by the Court in Rule 5.1(C) of the Civil Local Rules of Practice for the United States District Court for the Northern District of Georgia, specifically Times New Roman 14 pt. font.

/s/ Brian D. Spielman
Brian Spielman
Georgia Bar No. 596026

CERTIFICATE OF SERVICE

I certify that the foregoing document was electronically filed this day with the Clerk of the Court through the CM/ECF system, which will send notice of electronic filing to counsel of record.

This 15th day of February, 2024.

/s/ Brian D. Spielman
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